

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

---

)  
John Flynn, et al., )  
                        )  
                        )  
Plaintiffs,         )  
                        )  
                        )  
v.                     ) Civil Action No. 05-cv-1020  
                        ) (ESH)  
Schnell Contracting Services, LLC, )  
                        )  
                        )  
Defendant.         )  
                        )

---

**JOINT MOTION FOR ORDER TO VACATE JUDGMENT**

Plaintiffs and Defendants, by their respective attorneys, hereby move that this Court enter the accompanying proposed order, to supplement the Court's Minute Order of September 28, 2007. In support of this joint motion, the Parties state as follows:

1. The Parties reached a settlement of the matter, which required the Plaintiffs to file, and the Court to grant, a Motion to Vacate Judgment.
2. On September 28, 2007, this Court entered a Minute Order granting Plaintiffs' Motion to Vacate Judgment.
3. Counsel for Defendants wishes the Court to enter the accompanying order before settlement is finalized, and Plaintiffs have no objection.

WHEREFORE, the Parties respectfully move that this Court grant the Joint Motion for Order to Vacate Judgment against Defendant.

Respectfully submitted,

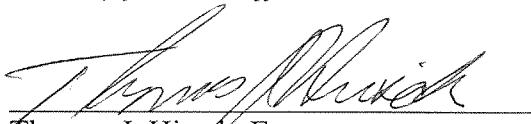
Nov. 27, , 2007



Ira R. Mitzner  
D.C. Bar No. 184564  
DICKSTEIN SHAPIRO  
1825 Eye Street NW  
Washington DC 20006

*Attorney for Plaintiffs*

Nov. 29, , 2007



Thomas J. Hirsch, Esq.  
N.J. Bar No. 00568-1974  
THOMAS J. HIRSCH, ATTORNEY AT LAW  
1001 Deal Road  
Ocean, New Jersey 07712

*Attorney for Defendants*